

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BAIS YAAKOV OF SPRING VALLEY, on behalf of
itself and all others similarly situated,

Plaintiff,

-vs.-

HOUGHTON MIFFLIN HARCOURT PUBLISHERS,
INC. and LAUREL KACZOR,

Defendants.

7:13 CV 4577 (KMK)(LMS)

**PLAINTIFF'S NOTICE OF
MOTION TO AMEND THE
FIRST AMENDED
COMPLAINT BY ADDING
EDUCATIONAL TESTING
SERVICE AS A DEFENDANT**

PLEASE TAKE NOTICE that upon the accompanying Declaration Aytan Y. Bellin and its attached exhibits, Plaintiff's Memorandum of Law, the pleadings in this action, and any further papers or argument to be submitted, Plaintiff Bais Yaakov of Spring Valley, on behalf of three proposed Classes of similarly situated persons, by its attorneys, will move this Court, at the United States District Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, at a date and time to be determined by the Court, for an Order amending the First Amended Complaint by adding Educational Testing Service as a defendant and for such further or other relief as this Court deems just and proper.

Dated: White Plains, New York
November 3, 2014

Respectfully Submitted,

BELLIN & ASSOCIATES LLC

/s/ Aytan Y. Bellin

By: Aytan Y. Bellin, Esq.
85 Miles Avenue
White Plains, NY 10606
Tel: (914) 358-5345

Fax: (212) 571-0284
Email: aytan.bellin@bellinlaw.com

Roger Furman, Esq.
7485 Henefer Avenue
Los Angeles, California 90045
Tel.: (310) 568-0640
Fax: (310) 694-9083
Email: roger.furman@yahoo.com

*Attorneys for Plaintiff and the Proposed
Classes*